



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

JUN 28 2013

Mr. Glen Schwartz  
Mile Rail, LLC  
8116 Wilson Road  
Kansas City, Missouri 64125

RE: Comments on the June 24, 2013 Removal Action Plan for the Former GST Steel Facility Site

Dear Mr. Schwartz:

The United States Environmental Protection Agency has reviewed the subject document and is providing the following comments to be incorporated in a revised Removal Action Plan.

1. Section 2.1: The last sentence of the first paragraph is inaccurate and should be deleted. The March 31, 2012 Work Plan did not include backfilling excavations prior to confirming clean with PCB-contaminated backfill material.
2. Sections 2.1, 2.2, 2.3, and 2.4 under the Section describing the details of the removal action should be re-numbered 4.1, 4.2, 4.3, and 4.4 accordingly. The Table of contents should also be corrected.
3. Section 2.2.2: This section should reference a figure that depicts the location of excavation areas 1, 2, 3, and 4.
4. The first two bullets on page 6 should state that concrete and fill material contaminated with PCBs exceeding 25 mg/kg will be excavated and disposed off-site at an approved facility.
5. Section 4.1.1: This section references Section 5.1.2. Section 5.1.2 is missing from the report.
6. Section 4.1.2: The discrete soil samples collected from backfill in excavation 2 failed to identify the portion of backfill soil that is contaminated with PCBs potentially exceeding 50 ppm. Without discrete sample results that identify an area of backfill within excavation 2 that contains PCB contamination attributable to the earlier composite soil sample result of 27 mg/kg, all of the backfill soil in excavation 2 will need to be managed as a TSCA regulated waste.
7. Section 4.1.2: This section should reference a figure that identifies the location of excavation 2.
8. Section 4.1.2: The second sentence of the second paragraph should be corrected to refer to "CBB" instead of "CCB."
9. Section 4.1.2: This section references Section 5.1.3. Section 5.1.3 is missing from the report.



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10. Section 2.2: This section starting on page 8 should be re-numbered Section 4.2. This should also be corrected in the Table of Contents. This section references Figure 3. Figure 3 should be included in the Figures Section as it was not provided in the draft. Figure 2 was also missing.
11. Sections 2.3 and 2.4 on page 9 should be re-numbered 4.3 and 4.4. This should also be corrected in the Table of Contents.

I can be reached at (913) 551-7755 if you have any questions concerning these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Morrison", with a long horizontal flourish extending to the right.

Bruce Morrison  
Project Manager  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Mark L. Finney, CB&I  
William Spratlin, CB&I